

ORIGINAL

FILED
DISTRICT COURT OF GUAM

JUN 22 2005/mbs

MARY L.M. MORAN
CLERK OF COURT

(13)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF GUAM

UNITED STATES OF AMERICA,) CRIMINAL CASE NO. 05-00036
Plaintiff,) SUPERSEDING INDICTMENT
vs.)
NORMAN HON SUEN CHAN,)
Defendant)

ALIEN SMUGGLING
[8 U.S.C. § 1324(a)(2)(B)(ii),
18 U.S.C. § 2, and
6 U.S.C. §§ 251 and 557]
(COUNTS 1 and 2)

THE GRAND JURY CHARGES:

COUNT 1 - ALIEN SMUGGLING

On or about August 2, 2004, within the District of Guam and elsewhere, the defendant, NORMAN HON SUEN CHAN, knowing or in reckless disregard of the fact than an alien did not receive prior official authorization to come to, enter or reside in the United States, did bring and attempt to bring to the United States an alien for the purpose of commercial advantage and private financial gain, to-wit: Li Qui Liu, to the Guam International Airport, in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), Title 18, United States Code, Section 2, and Title 6, United States Code, Sections 251 and 557.

1 COUNT 2 - ALIEN SMUGGLING

2 On or about September 14, 2004, within the District of Guam and elsewhere, the
3 defendant, NORMAN HON SUEN CHAN, knowing or in reckless disregard of the fact than an
4 alien did not receive prior official authorization to come to, enter or reside in the United States,
5 did bring and attempt to bring to the United States an alien for the purpose of commercial
6 advantage and private financial gain, to-wit: Wen Ling Ren, to the Guam International Airport, in
7 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), Title 18, United States Code,
8 Section 2, and Title 6, United States Code, Sections 251 and 557.

9 Dated this 22nd day of June, 2005.

10 A TRUE BILL.

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13 Foreperson

14 LEONARDO M. RAPADAS
15 United States Attorney
16 Districts of Guam and CNMI

17 By: Karon V. Johnson
18 KARON V. JOHNSON
19 Assistant U.S. Attorney

20 Reviewed:

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23 RUSSELL C. STODDARD
First Assistant U.S. Attorney